

**IN THE UNITED STATES DISTRICT COURT
FOR THE DISTRICT OF NEBRASKA**

JOHN DOE,)	
)	
Plaintiff,)	Case No. 4:18cv3142
)	
v.)	
)	
UNIVERSITY OF NEBRASKA,)	AGREED MOTION FOR EXTENSION OF
)	DEADLINES
UNIVERSITY OF NEBRASKA BOARD)	
OF REGENTS,)	
)	
JAKE JOHSON,)	
)	
LAURIE BELLOWS,)	
)	
MEAGAN COUNLEY,)	
)	
TONI ANAYA,)	
Defendants.)	
_____)	

COMES NOW Plaintiff John Doe through counsel Matthew Donnelly of Petefish, Immel, Hird, Johnson, Leibold and Sloan, LLP, and states to the Court:

1. Counsel for Plaintiff and Defendants have conferred regarding this case, and all parties consent and agree to the extension of the following deadlines:

The deadlines for identifying expert witnesses expected to testify at the trial, both retained and non-retained, are:

- Plaintiff: November 1, 2019
- Defendant: January 15, 2019

The deadlines for complete expert disclosures for all experts expected to testify at trial, both retained experts, and non-retained experts are:

- Plaintiff: November 1, 2019
- Defendant: January 15, 2020
- Plaintiff's rebuttal: February 7, 2020

The deadline for completing written discovery under Rules 33, 34, and 36 of the Federal Rules of Civil Procedure is February 28, 2020. Motions to compel discovery under Rules 33, 34, and 36 must be filed by March 16, 2020.

The deposition deadline is June 1, 2020.

The deadline for filing motions for summary judgment on qualified immunity is November 20, 2019.

The deadline for filing motions to dismiss and motions for summary judgment is July 1, 2020.

2. The parties agree that all other deadlines previously set and not referred to in this motion shall remain unchanged.

WHEREFORE, Plaintiff and Defendants respectfully request that this Court enter an order incorporating the above deadlines, agreed to by the parties, into the Court's Final Progression Order.

Submitted by:

JOHN DOE, Plaintiff

/s/ Matthew J. Donnelly
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Approved:

UNIVERSITY OF NEBRASKA; UNIVERSITY OF
NEBRASKA BOARD OF REGENTS; JAKE
JOHNSON; LAURIE BELLOWS; MEAGAN
COUNLEY; TONI ANAYA, Defendants

/s/ Lily Amare

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